## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

| In Re:                  | ) |                           |
|-------------------------|---|---------------------------|
|                         | ) | BK No. 19-29202           |
| Michael J. Garnmeister, | ) | Chapter 7                 |
| Debtor.                 | ) | Honorable David D. Cleary |

#### **NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on <u>Wednesday</u>, <u>December 2</u>, 2020, at 10:00 a.m., I will appear before the Honorable David D. Cleary, or any judge sitting in his place, and present the Motion of Creditor Judy Garnmeister for Entry of Agreed Order, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance at the courthouse is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: https://www.zoomgov.com/join. Then enter the meeting ID and passcode.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is 161 122 6457 and the passcode is Cleary644. The meeting ID and passcode can also be found on Judge Cleary's webpage on the court's website, https://www.ilnb.uscourts.gov/content/judge-david-d-cleary.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

#### CREDITOR JUDY GARNMEISTER'S MOTION FOR ENTRY OF AGREED ORDER

Creditor, Judy Garnmeister ("creditor"), through her undersigned attorney, states as follows in support of her motion:

- 1. Debtor filed a petition under Chapter 7 on 10/14/19, case number 19-29202.
- 2. In an effort to resolve this matter without further litigation, the parties have been in negotiations for several weeks now, and several orders of extension of time have been granted by the Court.
- 3. The parties have now reached a resolution in the form of the attached proposed agreed order, signed by debtor's attorney, and so creditor respectfully requests that this order be entered by the Court.

4. Entry of this order resolves this matter between creditor and debtor in this bankruptcy case, without the need to file an adversary proceeding or other motion practice.

**WHEREFORE**, creditor Judy Garnmeister respectfully requests this Honorable Court enter the proposed agreed order, and for other or different relief as this Honorable Court deems equitable and just.

Respectfully Submitted,

Judy Garnmeister

By: s/Scott C. Polman
Attorney for creditor

Scott C. Polman, Esq. Law Office of Scott C. Polman 8130 N. Milwaukee Ave. Niles, IL 60714 ph: (847) 292-1989 spolman.law@comcast.net No. 6294565

### **Certificate of Service**

The undersigned, attorney of creditor, hereby certifies that on  $\underline{11/20/20}$ , the following parties shall be served the foregoing via the method of service as so indicated below.

# s/Scott C. Polman

### **SERVICE LIST**

Motion for Entry of Agreed Order BK Case 19-29202 Motion filed – 11/20/20

| Name and/or Postal Address   | Email Address (if applicable) | Method of Service   |
|--|-------------------------------|---------------------|
| U.S. Trustee<br>Patrick S. Layng   | USTPRegion11.ES.ECF@usdoj.gov | Email CM/ECF system |
| Ronald R. Peterson, Trustee<br>Jenner & Block LLP<br>353 N. Clark St.<br>Chicago, IL 60654 | rpeterson@jenner.com          | Email CM/ECF system |
| Cincago, il 00034  | cutlerfilings@gmail.com       | Email CM/ECF system |

David H Cutler Cutler & Associates, Ltd. 4131 Main St. Skokie, IL 60076 Attorney for Debtor